

From: [Arjun Vasan](#)
To: [Makitalo, Rebecca I.](#)
Cc: [Keech, Ryan Q.](#); [Chiu, Stacey G.](#)
Subject: Re: Joint Rule 26(f) — Word draft attached for redline; return by 6:30 pm PT
Date: Thursday, August 14, 2025 9:24:56 PM
Attachments: [26f-joint-report - AV Edits - 9-03PM.pdf](#)

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Counsel,

You refuse to stipulate to a short stay of a family nonparty deposition pending the Rule 16 phasing order. That is disproportionate and premature given party sources (Agarwal, Bell, Myself, Rule 30(b)(6)) are available. See Rules 26(b)(1), 26(b)(2)(C), and 45(d)(1) (avoid undue nonparty burden; use less burdensome sources first).

Pursuant to C.D. Cal. Local Rule 37-1, this is my formal request to proceed by joint stipulation on a Rule 26(c) protective order staying family/investor/competitor non party depositions until after the Scheduling Conference. Please send your portion of the LR 37-2 joint stipulation within 5 days. If you decline or fail to provide your portion, I will file under LR 37-2.4 with a declaration noting your noncooperation and seek fees.

Separately, if you contend valid service occurred, confirm when/how and whether the \$40/day witness fee and mileage were tendered at service for any attendance demand. If the fee was not tendered, service is defective. See Rule 45(b)(1) and 28 U.S.C. § 1821. I also request a reasonable date to allow [Father's Name] to retain counsel.

Best,

Arjun (pro se)

On Thu, Aug 14, 2025 at 9:16 PM Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com> wrote:

As you know, Checkmate does not agree to phasing discovery and will not stipulate to a stay of discovery until the Scheduling Conference. Additionally, we have no further edits to the joint report. Please finalize and send for our final review and approval to file.

Thank you,

Rebecca Makitalo

Associate

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From: Arjun Vasan <arjun.vasan@gmail.com>

Sent: Thursday, August 14, 2025 9:06 PM

To: Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>

Cc: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>

Subject: Re: Joint Rule 26(f) — Word draft attached for redline; return by 6:30 pm PT [KLG-AMERICAS.FID3718879]

Counsel,

Withdraw or hold in abeyance the subpoena to Vasan Varadarajan until the Rule 16 Scheduling Conference sets phasing. He is a nonparty family member with, at most, limited Phase-1 relevance. Under Rules 26(b)(1), 26(b)(2)(C), and 45(d)(1), you must avoid undue nonparty burden and use less burdensome party sources (Agarwal, Bell, Myself, Rule 30(b)(6)) first. He has already submitted a declaration; a broad deposition now is cumulative and harassing and premature given the pending phasing dispute.

If you will not stipulate to a hold through the Scheduling Conference, I will move for a protective order and seek fees.

Please see the latest modifications to Plaintiff's sections. Please send as soon as possible with confirmation of no further edits from Checkmate's end.

Best,

Arjun